

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**Competitive Market Initiatives, D.T.E. 01-54**

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**REPLY COMMENTS  
OF DOMINION RETAIL, INC. ON PHASE II ISSUES**

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Pursuant to the order of the Massachusetts Department of Telecommunications and Energy (“DTE” or “Department”), dated June 29, 2001, inviting comments by interested parties on various issues identified by the DTE as “Phase II” issues, Dominion Retail, Inc. (“Dominion Retail”) filed its Initial Comments on January 4, 2002. Those comments are herein incorporated by reference.

In the instant filing, Dominion Retail replies to the initial comments of several parties on the following issues: (a) use of account numbers, and (b) Internet data exchange.

**A. Account Numbers:** Several parties, among them NSTAR Electric and the Competitive Suppliers, state their opposition to including customer account numbers on Customer Information Lists. Each of these parties cites the potential for “slamming” as a reason not to require the inclusion of account numbers on the lists. (See NSTAR Initial Comments at page 11, and Competitive Suppliers Initial Comments at page 7). The Competitive Suppliers, however, *would* support a requirement that account numbers be included for municipal aggregation programs. (See Competitive Suppliers Initial Comments at page 8).

Dominion Retail takes issue with the proposition that slamming is a likely result when account number information is provided upfront. Moreover, our view is that all categories of competitive suppliers—non-aggregators as well as aggregators—should be afforded equal access to account number data. In this regard, Dominion Retail takes particular issue with the Competitive Suppliers paradoxical view regarding opt-out municipal aggregation programs.

As noted in our Initial Comments, Dominion Retail has extensive experience as a direct access energy choice supplier in a number of jurisdictions. Among those jurisdictions are Pennsylvania and Virginia. In those states, account numbers are furnished to suppliers upfront. This fact alone has contributed immensely to the robustness and success of retail choice in these jurisdictions because of the efficiency and accuracy that account number usage promotes. Where slamming has occurred in Pennsylvania and Virginia, it has been almost exclusively confined to those suppliers who practice door-to-door solicitations and telemarketing. For suppliers such as Dominion Retail who rely on direct mail marketing and do not engage in these less highly-regarded marketing practices, slamming has been a virtual non-issue. Dominion Retail encourages the Department Staff to examine for itself how account number usage in Pennsylvania and Virginia has led to the success of retail choice in those states. Hopefully, further light on this subject will help eliminate what Dominion Retail believes is a significant degree of misinformation concerning the alleged cause and effect relationship between account numbers and slamming.

Finally, addressing the Competitive Suppliers position regarding municipal aggregation—that account numbers should be made available to aggregators but not so where non-aggregation, “standard enrollments” are being taken—there is no valid reason to establish such a double standard for account number usage. Indeed, non-aggregation suppliers will

unfairly suffer a competitive disadvantage if they are foreclosed from gaining upfront customer account information while the aggregators against whom they are competing are given access to that very information. Dominion Retail's position is that all duly licensed suppliers—competitive retail suppliers as well as aggregators—should be afforded the same access to account number information. Further, with such a process in place, it will no longer be necessary to include the first four characters of a customer's name in the enrollment process.

**B. Internet Enrollments:** Dominion Retail fully concurs in the recommendation of the Competitive Suppliers and others that the Department create “a policy that the Internet be used for the transmission of data between the utilities and the competitive suppliers.” (See Competitive Suppliers Initial Comments at page 13). NSTAR Electric, for its part, expresses concerns about the costs of moving to the Internet and proposes that the matter be referred to a working group for consideration. (See NSTAR Electric Initial Comments at page 12).

Dominion Retail is also sensitive to cost issues associated with electronic data transfer, but in Dominion Retail's experience the advantages of the Internet have already been proven and additional study is not warranted. To the extent that NSTAR Electric or other Massachusetts utilities have concerns about the costs or procedures involved with the Internet-based data exchange process, Dominion Retail is willing to make available its technical staff to work

closely with such entities and to consider other opportunities to provide assistance in implementing the transition to the Internet.

Respectfully submitted,

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